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**Gardy & Notis, LLP**  
Attorneys at Law

May 16, 2024

Via ECF

Hon. John G. Koeltl

United States District Court for the Southern District of New York

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

  
John G. Koeltl, U.S.D.J.

5/17/24

Re: Bolshakov, et al. v. Bank of America, N.A., No. 1:23-cv-10714-JGK

Dear Judge Koeltl:

This firm is one of the counsel for Plaintiff Julie Bolshakov ("Plaintiff") and the seven opt-in plaintiffs in the above action. I submit this letter motion, with the consent of Defendant Bank of America, N.A., to request extensions on the reply briefs that are due this Friday, May 17, 2024. This is the second such request for Plaintiff and the third such request for Defendant. These extensions do not affect any other scheduled dates in this action.

Plaintiff requests that the due date for her reply brief on her motion for conditional certification pursuant to the FLSA (Dkt. 29) be extended to June 3, 2024. Defendant requests a mutual extension to the same date for the reply on its motion to dismiss or transfer. Dkt. 25.

The reason for these extensions is because Plaintiff is in discussions with the plaintiffs in a recently filed action in the Supreme Court of New York for Nassau County, *Weinstein, et al. v. Bank of America, N.A.*, Index No. 607185/2024 (the "*Weinstein* Action"), which seeks preliminary approval of a settlement of a nationwide FLSA collective and New York class that overlaps with the proposed collective and class in this case. Defendant disclosed this settlement in its opposition to conditional certification. Dkt. 41 at 1-2.

If Plaintiff comes to an agreement to join *Weinstein* action, that agreement could obviate the need for further briefing on the motions in this case and could save the parties and the court resources and time.

I thank Your Honor for your attention to this matter.

Respectfully submitted,

Gardy & Notis, LLP

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May 16, 2024

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*Orin Kurtz*

Orin Kurtz

cc: All counsel (by ECF)